

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	CIVIL ACTION NO. 05-30202-MAP
THE WOLFINGTON GROUP,)	
)	
Plaintiff,)	
)	
V.)	
)	
BERTERA CHEVROLET, PONTIAC,)	
BUICK, INC.,)	
)	
Defendant.)	
_____)	

MOTION FOR ADMISSION OF
PRO HAC VICE

Pursuant to Fed.R.Civ.P. Local Rule 83.5.3, the defendant Bertera Chevrolet, Pontiac, Buick, Inc. ("Bertera") moves through its counsel Bonner Kiernan Trebach & Crociata, LLP for the admission of John D. Mason for the purpose of participating in the representation of Bertera in the above-captioned case, on the following grounds:

1. On or about September 12, 2005, the plaintiff, The Wolfington Group, filed a civil complaint in this action alleging that Bertera infringed a copyright owned by Plaintiff, and that Bertera violated M.G.L. ch. 93A.
2. John D. Mason is familiar with the underlying facts of this case and has been requested by Bertera to represent its interests in this case.
3. Good cause exists for the admission of Attorney John D. Mason because there is an attorney-client relationship between him and Bertera, pre-dating the subject matter of this litigation at bar, Attorney Mason has acquired extensive experience with respect to the litigation important to the defense of this case, and Attorney Mason is experienced in the

areas of law at issue in this case.

4. Mr. Mason is a member of the bar in good standing in the State of Maryland, the District of Columbia, the United States District Court, District of Maryland, United States District Court, District of Columbia, and the United States Court of Appeals, District of Columbia Circuit.

6. The admission of John D. Mason will not impede the progress of this action.

7. Attorney Mason agrees to comply with all rules of this Court and to submit to the disciplinary jurisdiction of this Court.

8. Filed herewith is a supporting certificate from Attorney Mason and Certificates of Good Standing from the State of Maryland and the District of Columbia.

9. The \$50 fee for admission will be filed separately.

WHEREFORE, the undersigned respectfully requests that Attorney John D. Mason of the law firm Bonner Kiernan Trebach & Crociata LLP be admitted pro hac vice in this action.

DEFENDANT,
Bertera Chevrolet, Pontiac, Buick, Inc.
By its attorneys,

DATED: March __, 2007

s/Kendra A. Krolikowski
John A. Kiernan (BBO No. 271020)
Kendra A. Krolikowski (BBO #667710)
Bonner Kiernan Trebach & Crociata
One Liberty Square - 6th Floor
Boston, MA 02109
(617) 426-3900

CERTIFICATE OF SERVICE

I, Kendra A. Krolikowski, hereby certify that a true copy of the above Motion for Admission *Pro Hac Vice* for John D. Mason was served upon the attorney of record for each other party via ECF Electronic Filing System, and First Class Mail, on March 30, 2007:

Counsel for the Plaintiff: Alfred C. Frawley, III, Esq. Roy T Pierce, Esq. Preti Flaherty Beliveau Pachios & Haley LLC One City Center PO Box 9546 Portland, ME 04112	Counsel for the Defendant: Christopher Browne, Esq. David M. Murphy, Esq. Mulberry Law Group 127 Mulberry Street P.O. Box 30058 Springfield, MA 01103-0058
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s/Kendra A. Krolikowski
Kendra A. Krolikowski